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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	4:15-CR-6049-EFS-10
vs.)	
)	United States' Response to
BRITTNEY LEE ZARAGOZA,)	Defendant's Second Motion to
)	Modify Conditions of Release
)	
Defendant.)	

Plaintiff, United States of America, by and through Joseph H. Harrington, Acting United States Attorney for the Eastern District of Washington, and Stephanie Van Marter, Assistant United States Attorney for the Eastern District of Washington, hereby submits the following response to Defendant's Second Motion to Modify Conditions or Release (ECF Nos. 434).

Defendant has filed a second motion to modify conditions of release, specifically asking the court to require a set schedule for her random UA's. As counsel noted in his motion, requiring a set schedule does in fact negate the importance of their random scheduling.

United States' Response to Defendant's Motion to Modify Conditions of Release - 1

Zaragoza.Response[401].docx

1 The United States contacted Probation Officer McCary who is requesting
2 that the Court keep intact the existing conditions relative to UA testing. However,
3 Officer McCary did volunteer that he can reduce the number per month and can
4 have them done at his office in order to try and assist with the transportation
5 issues the Defendant has raised.

6 The United States concurs that given the Defendant's history of drug
7 abuse, the UA condition should remain, however, further agrees with Probation's
8 officer to modify the frequency and manner in which the UA's are taken.

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10 DATED this 14th day of June 2017.

11 Joseph H. Harrington
12 Acting United States Attorney

13 *s/Stephanie Van Marter*

14 Stephanie Van Marter
15 Assistant United States Attorney
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CERTIFICATION

I hereby certify that on June 14, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following, and/or I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant(s):

Victor H. Lara, vh_lara@hotmail.com

s/Stephanie J. Van Marter

Stephanie Van Marter
Assistant United States Attorney